

John C. Quinn (*pro hac vice*)
jqunn@heckerfink.com
Hyatt Mustefa (*pro hac vice*)
hmustefa@heckerfink.com
Jocelyn Hassel (*pro hac vice*)
jhassel@heckerfink.com
Tayonna Ngutter (*pro hac vice*)
tngutter@heckerfink.com
Tanveer Singh (*pro hac vice*)
tsingh@heckerfink.com
HECKER FINK LLP
350 Fifth Avenue, 63rd Floor
New York, NY 10118
Telephone: (212) 763-0883

Joshua Matz (*pro hac vice*)
jmatz@heckerfink.com
Kaitlin Konkel (*pro hac vice*)
kkonkel@heckerfink.com
Joanne Grace Dela Peña (*pro hac vice*)
jdelapena@heckerfink.com
Brian Remlinger (*pro hac vice*)
bremlinger@heckerfink.com
HECKER FINK LLP
1050 K Street NW, Suite 1040
Washington, DC 20001
Telephone: (212) 763-0883

Leslie Brueckner (SBN: 140968)
lbrueckner@singletonschreiber.com
SINGLETON SCHREIBER, LLP
591 Camino de la Reina, Suite 1025
San Diego, CA 92108
Telephone: (619) 573-1851

Elizabeth Ryan (*pro hac vice*)
eryan@baileyglasser.com
BAILEY & GLASSER LLP
176 Federal Street, 5th Floor
Boston, MA 02110
Telephone: (617) 439-6730

Derek G. Howard (SBN: 118082)
derek@derekhowardlaw.com
DEREK G. HOWARD LAW FIRM, INC.
42 Miller Avenue
Mill Valley, CA 94941
Telephone: (415) 432-7192
Facsimile: (415) 524-2419

Attorneys for Plaintiff Dr. Andrew Forrest

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

DR. ANDREW FORREST,

Plaintiff,

v.

META PLATFORMS, INC.

Defendant.

Case No. 22-CV-03699-PCP (VKD)

**PLAINTIFF ANDREW FORREST'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

The Honorable Virginia K. DeMarchi

Pursuant to Civil Local Rules 7-11, 79-5(e), and 79-5(f), Plaintiff Andrew Forrest submits this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed in connection with a Joint Discovery Letter Brief ("Letter Brief") and accompanying attachment.

The unredacted Letter Brief contains material designated as Protected Material by Defendant Meta Platforms, Inc. pursuant to the Second Amended Protective Order ("Protective Order") entered in this matter. *See* ECF 234. In addition, as required by the Court's October 29, 2025 order, *see* ECF 289 at 4, the Letter Brief includes as an attachment the proposed discovery requests at issue, Plaintiff's First Set of Requests for Admission. This attachment contains material designated by Defendant as Protected Material pursuant to the Protective Order.

Section 14.4 of the Protective Order provides that "[w]ithout written permission from the Designating Party or a court order . . . , a Party may not file in the public record in this action any Protected Material." *Id.* ¶ 14.4. Section 14.4 further provides that "[a] Party that seeks to file under seal any Protected Material must comply with Civil Local Rule 79-5." *Id.* Civil Local Rule 79-5(f), in turn, provides that where, as here, a Filing Party seeks to seal a document because it has been designated as confidential by another party, the Filing Party must file an Administrative Motion to Consider Whether Another Party's Material Should Be Sealed.

Based on the foregoing, Plaintiff moves the Court to consider whether the following material should be conditionally filed under seal:

Document	Designating Party	Portion(s) to Seal	Reason for Sealing
Unredacted Joint Discovery Letter Brief	Defendant Meta Platforms, Inc.	Highlighted portions on page 6	Designated as "CONFIDENTIAL" Protected Material by Defendant
Unredacted Plaintiff's First Set of Requests for Admission	Defendant Meta Platforms, Inc.	Highlighted portions on pages 6-14	Designated as "CONFIDENTIAL" Protected Material by Defendant

Consistent with Section 14.4 of the Protective Order, Plaintiff has redacted this material from the publicly filed version of the Letter Brief and the accompanying exhibit. Plaintiff takes

no position as to whether the material should be sealed, and he reserves all rights to challenge Defendant's sealing requests and confidentiality designations.

Plaintiff is serving this motion on Defendant the same day it is being filed, by CM/ECF and email.

Dated: November 24, 2025

Respectfully submitted,

/s/ John C. Quinn

John C. Quinn (*pro hac vice*)

jquinn@heckerfink.com

Hyatt Mustefa (*pro hac vice*)

hmustefa@heckerfink.com

Jocelyn Hassel (*pro hac vice*)

jhassel@heckerfink.com

Tayonna Ngutter (*pro hac vice*)

tngutter@heckerfink.com

Tanveer Singh (*pro hac vice*)

tsingh@heckerfink.com

HECKER FINK LLP

350 Fifth Avenue, 63rd Floor

New York, NY 10118

T: 212.763.0883

Joshua Matz (*pro hac vice*)

jmatz@heckerfink.com

Joanne Grace Dela Peña (*pro hac vice*)

jdelaena@heckerfink.com

Kaitlin Konkel (*pro hac vice*)

kkonkel@heckerfink.com

Brian Remlinger (*pro hac vice*)

bremlinger@heckerfink.com

HECKER FINK LLP

1050 K Street NW | Suite 1040

Washington, DC 20001

T: 212.763.0883

Leslie Brueckner (SBN: 140968)

lbrueckner@singletonschreiber.com

SINGLETON SCHREIBER, LLP

591 Camino de la Reina, Suite 1025

San Diego, CA 92108

Telephone: (619) 573-1851

Elizabeth Ryan (*pro hac vice*)

eryan@baileyglasser.com

BAILEY & GLASSER LLP

176 Federal Street, 5th Floor

Boston, MA 02110

Telephone: (617) 439-6730

Derek G. Howard (SBN: 118082)

derek@derekhowardlaw.com

DEREK G. HOWARD LAW FIRM, INC.

42 Miller Avenue

Mill Valley, CA 94941

Telephone: (415) 432-7192

Facsimile: (415) 524-2419

Attorneys for Plaintiff Dr. Andrew Forrest

CERTIFICATE OF SERVICE

I, John C. Quinn, hereby certify that on November 24, 2025, the foregoing document and attachments were electronically filed using the Court's CM/ECF system, and an email copy of the documents filed under seal will be sent to counsel of record.

/s/ John C. Quinn
John C. Quinn